



WENDY R. STEIN
Director

Gibbons P.C.
One Pennsylvania Plaza, 37th Floor
New York, New York 10119-3701
Direct: (212) 613-2043 Fax: (212) 554-9645
wstein@gibbonslaw.com

September 1, 2020

VIA ECF

The Honorable Gary R. Brown, U.S.D.J.
United States District Court for the Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, New York 11722-9014

Re: *Soter Technologies, LLC v. IP Video Corporation, et al.*,
Civ. No. 2:20-CV-02989 (GRB)(AKT) (E.D.N.Y.)

Dear Judge Brown:

We represent Plaintiff and Counterclaim Defendant Soter Technologies LLC and Third Party Defendant Derek Peterson in the above-referenced action.

With the consent of counsel for Counterclaim Plaintiff and Defendants IP Video Corporation & Halo Smart Solutions, Inc., and for Defendants A+ Technology & Security Solutions, Inc. and Advance Convergence Group, Inc., we respectfully submit the attached Stipulation and Proposed Order for Your Honor's consideration. If Your Honor finds this document acceptable, we respectfully request that Your Honor "So-Order" and direct its entry on the docket.

Should the Court wish to discuss this matter further, we are available at the Court's convenience. We thank the Court for its time and assistance in this matter.

Respectfully Submitted,

Wendy R. Stein

Attachment

cc: all counsel of record (via ECF and email)